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Date: 12/22/2021 2:18:19 PM
Subject: McCormick & Baxter Five-Year Review

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Sarah/Anne,

As the technical consultant for the Five Tribes (Grand Ronde, Nez Perce, Siletz, Umatilla, and Warm Springs) involved in the Portland Harbor Superfund Site (PHSS) cleanup, my team read the McCormick & Baxter Five-Year Review with interest. We are particularly interested in any risks that the McCormick & Baxter site poses to recontamination of PHSS following construction of the remedy. We would appreciate the opportunity to speak with you regarding some questions we have. Could you let me know some times that work for you the week of January 10?

Questions we'd like to discuss include:

1. What do you see as lessons learned from the McCormick & Baxter remedy and monitoring that could potentially be applied to PHSS and adjacent upland properties? For instance, related to containment, extraction, and monitoring of NAPL? We were also curious whether there is a suspected cause of the subsidence of the soil cap and whether there may be some lessons learned there.
2. We understand that the current McCormick & Baxter groundwater thresholds will be replaced with the PHSS cleanup levels. It is our understanding that many of the groundwater cleanup levels will be exceeded. What are EPA and DEQ's plans at that point? Do you anticipate needing to take action to meet the groundwater cleanup levels?
3. The Review acknowledges increasing arsenic concentrations in porewater downgradient of the stormwater infiltration pond but states that the cause of the increase is unknown and recommends continued five-year monitoring. At what point in time or at what concentration would EPA and DEQ believe that additional studies should be conducted to identify the source of the increase? What would trigger additional action?
4. It appears that the dioxin/furan concentrations in crayfish tissue exceed the PHSS fish tissue targets by approximately an order of magnitude. Is additional crayfish monitoring anticipated? Do you plan to coordinate efforts with the PHSS team on long-term tissue monitoring? For any future dioxin/furan evaluations, we encourage you to consult the Laboratory Survey Results memo that DEQ's contractor Maul Foster Alongi developed for PHSS, as this may be helping in identifying labs that can achieve low detection limits.
5. DNAPL thickness increased quite a bit outside the barrier wall at well MW-20i in 2020. What is the believed source of this increase (e.g., from the stranded wedge outside the barrier wall or from an inability of the barrier wall to contain the DNAPL behind it)? Is this magnitude of increase sufficient to warrant conducting additional NAPL extraction? If not, what would trigger additional extraction?
6. PAHs were not measured in groundwater wells with known NAPL. Is there value in knowing PAH

6. concentrations in these wells to paint a fuller picture of the risk of recontamination to the Willamette River? If not, we think it may be worthwhile to measure PAH concentrations in wells that are located near those with NAPL presence but do not themselves contain NAPL. For example, MW-34i does not have measurable NAPL and is downgradient of MW-20i. Adding PAH measurements at MW-34i, couple with those at EW-19s, which is further downgradient, could help inform any potential migration.

Thank you,

Gail

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